

EXHIBIT B (EXCERPT)

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

IN RE PORK ANTITRUST
LITIGATION

Civil No. 18-1776 (JRT/HB)

ALL PLAINTIFFS' FIRST SET OF
REQUESTS FOR PRODUCTION OF
DOCUMENTS TO DEFENDANT AGRI
STATS, INC.

This Document Relates to: All Actions

REQUEST FOR PRODUCTION NO. 14:

All Documents concerning any internal investigation, government investigation, litigation, or other inquiry into possible or alleged violations of federal, state, or international antitrust laws, competition laws, anti-monopoly laws, anti-cartel laws, unfair competition laws, and any similar laws or regulations relating to your services provided to the Pork industry.

REQUEST FOR PRODUCTION NO. 15:

All Documents concerning Pork supply rationalization, industry leadership, industry discipline, production discipline, supply discipline, capacity discipline, or other so-called disciplined approaches or practices relating to your services provided to the Pork industry.

REQUEST FOR PRODUCTION NO. 16:

For each Document Custodian, all:

- a) electronic and hard copy diaries, calendars, appointment books, notebooks, to-do lists, Day Timers, day planners or appointment notes;
- b) trip and travel logs, expense and entertainment reports, and other supporting Documents;
- c) a copy of the Person's most recently created resume or curriculum vitae (CV);
- d) copies of any transcripts or recordings of prior testimony relating to Competitive Conditions in the market for Pork, such as testimony at a deposition, trial, or public hearing;
- e) Documents sufficient to show the Document Custodian's complete contact information, including all phone numbers, social media user names or "handles," and email addresses used by such persons for any business purposes, even if only sparingly; and

- f) Any severance agreements in connection with the Document Custodian ceasing employment or changing employment status with You (without time limitation).

REQUEST FOR PRODUCTION NO. 17:

All Documents concerning Pork pricing behavior at each level of distribution, including the extent that costs were passed on.

REQUEST FOR PRODUCTION NO. 18:

All Documents concerning the relationship of Pork prices between distribution levels.

REQUEST FOR PRODUCTION NO. 19:

All Documents concerning the effect of changes in the supply of Pork on the price of Pork at each distribution level.

REQUEST FOR PRODUCTION NO. 20:

All Documents relating to the anonymity, or lack thereof, of Pork Integrators within any of Your reports, including documents concerning Your knowledge that the identities of Pork Integrators in reports could be determined.

REQUEST FOR PRODUCTION NO. 21:

All Documents concerning the disclosure of data or information concerning one or more Pork Integrators by name to a competing Pork Integrator, whether intentional or accidental, and all steps taken to claw back or remediate the disclosure.

REQUEST FOR PRODUCTION NO. 22:

All Documents concerning any Defendant's request that information be included or excluded in Agri Stats reports or publications.